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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION
12

13 UNITED STATES OF AMERICA,)	CASE NO. 4:24-cr-00279-HSG
)	
14 Plaintiff,)	UNITED STATES' SENTENCING
)	MEMORANDUM
15 v.)	
)	
16 ROBERT BELL JR.,)	Hearing Date: July 30, 2025
)	Time: 2:00 p.m.
17 Defendant.)	Judge: Hon. Haywood S. Gilliam, Jr.
)	

18
19 **I. INTRODUCTION**

20 In May 2023, Robert Bell Jr. robbed two U.S. Postal Service mail carriers of their postal keys. He
21 then used those keys to steal mail from community mailboxes and collection boxes that he later used in
22 various fraud and identity theft schemes. In July 2023, U.S. Postal Inspectors executed search warrants
23 on Bell's house and vehicle, where they found postal keys and a multitude of stolen mail, counterfeit
24 checks, and other materials Bell used in his schemes. They also located a gun in the glove box of his car.
25 Bell subsequently pleaded guilty to two counts of robbery of a mail carrier and aiding and abetting in
26 violation of 18 U.S.C. §§ 2114(a), 2; and one count of possession of stolen mail keys in violation of
27 18 U.S.C. § 1704. On July 30, 2025, Bell is scheduled to be sentenced following his successful completion
28 of the Leading Emerging Adults to Develop Success (LEADS) program. Based on Bell's completion of

the LEADS program and the reasons set forth herein, the government recommends a sentence of time served, three years' supervised release, and a \$300 special assessment.

II. OFFENSE CONDUCT AND SENTENCING GUIDELINES CALCULATION

A. The May 4, 2023, Robbery of a Letter Carrier in Antioch

On May 4, 2023, Bell was driving a car near Chickie Street in Antioch, California with Individual 1 in the passenger seat. Bell and Individual 1 were driving around looking for a U.S. Postal Service mail carrier so that they could rob him of the postal keys. These types of keys are referred to as "arrow keys," and they unlock certain community mailboxes and collection boxes. Bell wanted these arrow keys so that he could access community mailboxes and collection boxes where he could steal mail and use the mail to engage in fraud, identity theft, and other similar offenses.

At approximately 3:30 p.m., Bell and Individual 1 spotted a mail carrier on Chickie Street. Individual 1 exited the car Bell was driving and approached the mail carrier. As the mail carrier was walking back to his mail truck after dropping a parcel off at a residence, Individual 1 approached him and demanded the mail carrier's arrow key. At the time, Individual 1 had his hands inside the pockets of his hooded sweatshirt and told the mail carrier, "Give me the arrow key or else." The carrier said, "Or what?" Individual 1 replied, "Come on, I don't want to do this. You're a cool guy, just give me the key." The carrier removed the arrow key from his key ring, gave it to Individual 1, and then Individual 1 walked away and into the car Bell was driving. Once Individual 1 entered the car, Bell drove away from the scene of the robbery. Approximately five minutes after the robbery, Bell took photos of Individual 1 and a key they had stolen.



B. May 17, 2023, Robbery of a Letter Carrier in San Francisco

At approximately 1:20 p.m. on May 17, 2023, Bell was driving a car near the intersection of Carrizal Street & Parque Drive in San Francisco with Individual 2 in the passenger seat. Bell was once again driving around looking for a U.S. Postal Service mail carrier so that he and Individual 2 could rob him of the arrow keys he was carrying. As they drove around, Bell saw that Individual 2 had a gun with him in the car. After locating a mail carrier, Bell stopped the vehicle and he and Individual 2 got out of the car and approached the mail carrier, who was tending to the mail in the rear of his mail vehicle. Bell then demanded that the mail carrier give them his arrow keys. At the same time Bell made this demand, Individual 2 brandished a gun that he had in his waistband. The mail carrier put his hands in the air and then gave Bell a key ring that included various U.S. Postal Service keys, including arrow keys. Bell and Individual 2 then got back in the car and fled the scene. When Bell dropped Individual 2 off at a different location than the robbery, Bell gave him some checks he had previously stolen using the arrow keys he had taken from the mail carrier during the May 4, 2023. Bell gave these stolen checks to Individual 2 as compensation for him assisting with the robbery.

C. Bell's Possession of Stolen Mail Keys on July 18, 2023

On July 18, 2023, U.S. Postal Inspectors executed search warrants at Bell's residence and on his car. In his bedroom, Inspectors found five genuine U.S. Postal Service keys, including the arrow keys he had taken during the May 4 and May 17 robberies. They also found copious amounts of checks, counterfeit checks, check stock, stolen mail, blank credit cards, and ATM receipts from financial institutions. In total, Inspectors located approximately 642 items containing stolen/counterfeit checks, stolen mail, credit cards, IDs, and other items in Bell's bedroom. Postal Inspectors also found a fraudulent U.S. Postal Service identification card with Bell's photo on it and the name "Raheem A. Henley" with the title "Collection Box Officer." In the glove compartment of Bell's car, Inspectors found a loaded, stolen Taurus, model G3, 9mm pistol sitting on top of a stack of more than 30 stolen checks.

D. The Government Objects to the Calculation of the Offense Level in the PSR

Pursuant to the terms of the plea agreement, the government objects to the PSR's five-level enhancement under U.S.S.G. § 2B3.1(b)(2)(C) for the brandishing of a firearm, as well as the two-level

enhancement under § 2B1.1(b)(2)(A) for more than 10 victims.¹ The government requests that the Court adopt the guidelines calculation from the Plea Agreement, which is set forth below.

Count 1: Aiding and Abetting Robbery of Mail Carrier (18 U.S.C. §§ 2, 2114(a)) Count 2: Robbery of a Mail Carrier (18 U.S.C. § 2114(a)) Count 3: Possession of Stolen Mail Keys (18 U.S.C. § 1704)		
	U.S.S.G. Section	Level/Points
Group 1 – Aiding and Abetting Robbery of a Mail Carrier		
Base offense level – Count 1	§ 2B3.1	20
Specific Offense Characteristic: - Property of post office taken	§ 2B3.1(b)(1)	+2
Adjusted offense level – Group 1		22
Group 2 – Robbery of a Mail Carrier		
Base offense level – Count 2	§ 2B3.1	20
Specific Offense Characteristic: - Property of post office taken	§ 2B3.1(b)(1)	+2
Adjusted offense level – Group 2		22
Group 3 – Possession of Stolen Mail Keys		
Base offense level – Count 3	§ 2B1.1	6
Adjusted offense level – Group 3		6
Grouping		
Multiple counts	§ 3D1.4(a)	+2
Adjusted offense level		24
Acceptance of responsibility	§ 3E1.1	-3
Total offense level		21

The government agrees with the PSR's calculation of Bell's Criminal History Category (CHC). With a total of criminal history score of zero, Bell has a CHC of I. PSR ¶ 49. Applying the guidelines from the Plea Agreement, the advisory Guidelines range here is 37-46 months. If the Court adopted the PSR's total offense level of 25, the advisory Guidelines range would be 57-71 months. PSR ¶ 72.

III. SENTENCING RECOMMENDATION

A. Legal Standard

The United States Sentencing Guidelines serve as “the starting point and the initial benchmark” of any sentencing process and are to be kept in mind throughout the process. *See United States v. Carty*, 520 F.3d 984, 991 (9th Cir. 2008); *see also United States v. Kimbrough*, 522 U.S. 85, 108 (2007). The

¹ The government acknowledges that these enhancements are appropriate under the Guidelines.

1 overarching goal of sentencing, as set forth by Congress, is for the Court to “impose a sentence sufficient,
 2 but not greater than necessary.” *Carty*, 520 F.3d at 991 (citation omitted). In accomplishing that goal,
 3 the Court should consider the factors set forth under 18 U.S.C. § 3553(a), which include:

- 4 (1) the nature and circumstances of the offense and the history and
 5 characteristics of the defendant;
- 6 (2) the need for the sentence imposed to reflect the seriousness of the
 7 offense, to promote respect for the law, and to provide just
 8 punishment for the offense;
- 9 (3) the need for the sentence imposed to afford adequate deterrence to
 10 criminal conduct; and
- 11 (4) the need to avoid unwarranted sentence disparities among
 12 defendants with similar records who have been found guilty of
 13 similar conduct.

14 **B. The Government’s Recommended Sentence**

15 As the PSR notes, Bell has successfully completed the LEADS program. He has “maintained
 16 sobriety, participated in all required programming, maintained employment, furthered his education, and
 17 obtained a barber’s license” while on pretrial release. PSR ¶ 95. The government congratulates Bell on
 18 his success in the program and encourages him to continue doing the hard work that will be required to
 19 maintain his current positive trajectory. Based on Bell’s successful completion of the LEADS program,
 20 and pursuant to the plea agreement in this case, the government recommends that the Court sentence him
 21 to time served.

22 **IV. CONCLUSION**

23 For the foregoing reasons, the United States recommends that the Court sentence Bell to time
 24 served, three years’ supervised release, and a \$300 special assessment.

25 DATED: July 23, 2025

Respectfully submitted,

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 United States Attorney

/s/ Andrew Paulson
 ANDREW PAULSON
 Assistant United States Attorney